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October 22, 2021

BY ECF

The Honorable Sarah Netburn
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007

Re: In re Terrorist Attacks on September 11, 2001, 03-md-1570 (GBD) (SN)

Dear Judge Netburn:

We write on behalf non-party John Fawcett and Defendant Kingdom of Saudi Arabia ("Saudi Arabia") to advise the Court of the status of the forensic imaging process of Mr. Fawcett's devices, as required by Order dated October 21, 2021. (ECF No. 7277.)

Status Report Provided by Counsel to Mr. Fawcett

Lankler Siffert & Wohl LLP retained the services of StoneTurn Group, LLC, a forensic investigation firm in New York City, to create forensic images of Mr. Fawcett's personal devices so that data on those devices may be preserved and subject to analysis as directed by the Court. The subject devices are Mr. Fawcett's personal laptop computer and two personal cell phones. StoneTurn was provided with the protective orders in this case and signed the FBI Protective Order prior to receiving any devices. StoneTurn reported that the status of the imaging process is as follows:

Laptop Imaging Process

Upon receipt of the laptop, StoneTurn executed a chain of custody form. StoneTurn then disassembled the laptop and removed the internal HDD storage device. To prevent altering the data on the laptop, StoneTurn connected the HDD to a forensic write blocker and attached that to a forensic workstation. StoneTurn used AccessData FTK Imager to create a complete Physical forensic image of the device into an E01 forensic image format. The forensic preservation was successfully completed and then verified using an MD5 and SHA1 hashing. The resulting forensic image was copied to two different hard drives and stored in StoneTurn's evidentiary vault for safekeeping.

Mobile Device Imaging Process

After taking possession of the mobile devices, StoneTurn executed a chain of custody form. The devices were immediately placed into airplane mode. Once in airplane mode they were connected to a Cellebrite Forensic bridge and were forensically imaged with Cellebrite UFED4PC.

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After successfully being imaged with UFED4PC StoneTurn captured an additional forensic image using Oxygen Forensic Detective. The resulting forensic images were copied to two different hard drives and stored in StoneTurn's evidentiary vault for safekeeping.

The devices are thus secured and imaged, and the images have been processed and are able to be searched by StoneTurn using various forensic tools adapted for different purposes.

LSW is directing StoneTurn to complete the forensic searches necessary to comply with the Court's Order for discovery production. (ECF No. 7277.) LSW and StoneTurn are diligently working to locate responsive material and information, including information about records of potentially deleted materials on the devices responsive to Requests Two and Three propounded by Defendant Saudi Arabia in an email dated October 14, 2021 attached as Ex. A to the Joint Letter filed on October 18, 2021 (ECF No. 7275). StoneTurn has also conducted a search for material responsive to Request Five, relating to communications sent from Mr. Fawcett's ProtonMail account. We expect to work throughout the weekend in order to be able to comply with the deadline of Monday, October 25, to produce material not subject to a privilege or work product assertion. To the extent responsive material may potentially be subject to a privilege or work product assertion by either the Kreindler Firm or the PEC's, we will provide such materials to those parties for their review no later than October 25, 2021, as provided in the Order of October 21.

Respectfully submitted,

/s/ Gabrielle S. Friedman

Gabrielle S. Friedman

Cc: All MDL Counsel of Record (via ECF)